

## REMARKS

This is intended as a full and complete response to the Office Action dated August 19, 2003, having a shortened statutory period for response set to expire on November 19, 2003. Claims 17, 20, 21, 24-26, and 30 have been amended to more clearly recite aspects of the invention. The amendments have been made in a good faith effort to advance prosecution on the merits. Claims 4 and 17-34 remain pending in the application after entry of this response. Claims 31-36 have been added. Applicants believe no new matter has been introduced by the amendments and the new claims presented herein. Claims 4 and 17-30 are rejected. Reconsideration of the rejected claims is requested for reasons presented below.

In the specification, the paragraph beginning at page 3, line 3, has been amended to correct minor editorial problems.

Claims 4 and 28 are objected to because they are duplicate claims. Applicants respectfully traverse the objection. Claim 4 depends directly from claim 17. Claim 28 depends from claim 18, which in turn depends from claim 17. Accordingly, claim 28 incorporates the limitations from claim 18, which claim 4 does not do. Withdrawal of the objection is respectfully requested.

Claims 17, 19, 22-24, 26 and 27 stand rejected under 35 USC § 102(e) in view of U.S. Patent No. 6,343,651 (*Bixenman*).

*Bixenman* generally proposes a sand control assembly coupled to a flow control assembly including a sand screen and a flow path defined inside the sand screen in fluid communication with at least one orifice. A control line routing channel is formed by disposing walls between the sand screen and an outer shroud. A portion of the outer shroud may be removed to expose the channel. However, *Bixenman* does not disclose "a channel having a floor and walls, wherein the floor and walls are *defined by* the perforated tube" of claims 17 and 35. (See Application, Figure 1A.) In *Bixenman*, the control line routing channel 152 is defined by walls and the screen 42. (See *Bixenman*, Figure 8.) At best, the outer shroud 104A only slightly defines member 152 (just above the walls). Accordingly, claims 17 and 35 are patentable over *Bixenman*. Claims 19,

22, and 23 are also patentable since they depend from claim 17. Since claims 24, 26, and 27 now depend from claim 30, they are discussed with claim 30 below.

Claim 18 stands rejected under 35 USC § 103(a) as being unpatentable over *Bixenman* in view of U.S. Patent No. 5,979,551 (*Uban*). As noted above, *Bixenman*, does not teach, suggest or show a channel with walls and a floor defined by the perforated tube. Further, *Uban* does not teach, suggest or a channel with walls and a floor defined by the perforated tube. *Bixenman* and *Uban*, alone or in combination, do not teach or disclose all the limitations recited in claim 17. Therefore, claim 17 is patentable over *Bixenman* in view of *Uban*. Claim 18 is also patentable over *Bixenman* in view of *Uban* because it depends from claim 17.

Claim 20, 21, and 30 stand rejected under 35 USC § 103(a) as being unpatentable over *Bixenman*. *Bixenman* does not teach, suggest, or show “a preformed channel coupled to the tube” of claims 30 and 36. In *Bixenman*, the control line routing channel 152 is formed from three distinct members: two walls and the screen 42, which have been assembled to form the control line routing channel. As such, the control line routing channel 152 is not preformed. Accordingly, claim 30 is patentable over *Bixenman*. Claims 20, 21, 24, 26, and 27 and new claims 31-34 are also patentable since they depend from claim 30.

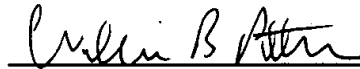
Claim 25 stands rejected under 35 USC § 103(a) as being unpatentable over *Bixenman* in view of U.S. Patent No. 4,096,911 (*Geske*). As noted above, *Bixenman*, does not teach, suggest or show a preformed channel coupled to the tube. Further, *Geske* does not teach, suggest or show a preformed channel coupled to the tube. *Bixenman* and *Geske*, alone or in combination, do not teach or disclose all the limitations recited in claim 30. Therefore, claim 30 is patentable over *Bixenman* in view of *Geske*. Claim 25 is also patentable over *Bixenman* in view of *Geske* because it depends from claim 30.

Claims 4, 28, and 29 stand rejected under 35 USC § 103(a) as being unpatentable over *Bixenman* in view of U.S. Patent No. 6,173,788 (*Lembcke*). As noted above, *Bixenman*, does not teach, suggest or show a channel with walls and a floor defined by the perforated tube. Further, *Lembcke* does not teach, suggest or show a channel with walls and a floor defined by the perforated tube. *Bixenman* and *Lembcke*,

alone or in combination, do not teach or disclose all the limitations recited in claim 17. Therefore, claim 17 is patentable over *Bixenman* in view of *Lembcke*. Claims 4, 28, and 29 are also patentable *Bixenman* in view of *Lembcke* because they depend from claim 17.

In conclusion, the reference cited by the Examiner does not teach, show, or suggest the apparatus of the present invention. Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully requests that the claims be allowed.

Respectfully submitted,



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